

February 23, 2018

Mr. Matthew Gordon  
Sunoco Logistics, L.P.  
535 Fritztown Road  
Sinking Spring, PA 19608

Re: Piney Creek, HDD location S2-0142, DEP Permit No. E07-459 and  
Hildenbrand Road Crossing, HDD location S1B-0190, DEP Permit No. E65-973

Dear Mr. Gordon:

This letter is sent to modify the Department of Environmental Protection's (DEP) review letters issued on February 1, 2018 for the HDD re-evaluation for Piney Creek, HDD location S2-0142, DEP Permit No. E07-459 and on February 8, 2018 for the horizontal directional drilling (HDD) re-evaluation for Hildenbrand Road Crossing, HDD location S1B-0190, DEP Permit No. E65-973. Those letters were issued, in part, in response to Sunoco's re-evaluations for both sites that had indicated that the HDD "could affect individual well use during active drilling." Accordingly, in both DEP letters, DEP had indicated that, in order to resolve this issue, Sunoco needs to enter into written agreements with all private water supply owners whose water supplies may be impacted by this drill as part of this reevaluation and in advance of commencing the HDD.

Under those agreements, Sunoco would be required to provide temporary and if necessary, permanent replacement potable water supplies adequate in quantity and quality for the purposes served, to the satisfaction of all potentially affected water supply owners. In addition, Sunoco would be required to provide proof of these agreements to DEP with a response to those letters. DEP also indicated that the agreements should provide for Sunoco to conduct water quality and quantity testing of each potentially affected water supply prior to, during, and after the HDD activities.

In addition, with regard to the Hildenbrand Road Crossing HDD location, DEP had also indicated that this requirement includes water supply owners located greater than 150 linear feet from the profile if it is determined that there may be impacts to the water supply.

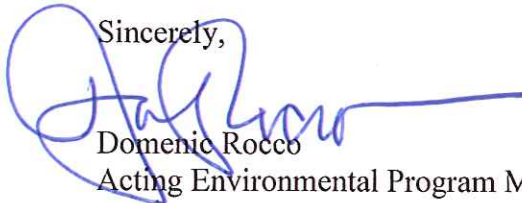
After further consideration, DEP has recognized that providing Sunoco with only one option for addressing potential water supply impacts was too restrictive given that there may be other, more effective, options available to Sunoco to avoid impacts to water supplies. Accordingly, DEP is modifying its letters of February 1, 2018 (Piney Creek, HDD location S2-0142, DEP Permit No. E07-459) and February 8, 2018 (Hildenbrand Road Crossing, HDD location S1B-0190, DEP Permit No. E65-973) to acknowledge that reality.

In its response to the concerns raised by DEP with regard to potential impacts to water supplies at both HDD locations, if Sunoco chooses not to pursue the agreements with the private water supply owners, it must provide a discussion of actions to be taken by Sunoco to prevent water supply impacts from occurring. Sunoco needs to demonstrate how, in the absence of the agreements described above, Sunoco will avoid impacts to all water supplies. Sunoco's approach should include the utilization of technical and non-technical measures to avoid and minimize such impacts, including, but not limited to, the conversion of the HDD to a trench installation, use of other trenchless construction methods, the use of American National Standards Institute/National Sanitation Foundation (ANSI/NSF) Standard 60 approved gels or other approved additives that could prevent such impacts from the Drill, or some combination of all of the above. To the extent Sunoco proposes to use any ANSI/NSF 60 certified HDD additives, consistent with Special Condition 00 contained in DEP Permit No. E07-459 and Special Condition H.5 contained in DEP Permit No. E65-973, Sunoco will need to demonstrate that the manner in which Sunoco anticipates using each additive is consistent with the manner indicated in the ANSI/NSF Standard 60 certification for that additive. In addition, Sunoco should indicate whether it will be following all conditions included as part of the additive's certification or, if not, provide an explanation as to why it is not and why that deviation is acceptable.

If you have additional questions with regard to the Piney Creek, HDD location S2-0142, please contact Scott Williamson by e-mail at [scwilliams@pa.gov](mailto:scwilliams@pa.gov) or by telephone at 717.705.4799.

If you have additional questions with regard to the Hildenbrand Road Crossing, HDD location S1B-0190, please contact Dana Drake by e-mail at [dadrake@pa.gov](mailto:dadrake@pa.gov) or by telephone at 412.442.4149.

Sincerely,



Domenic Rocco  
Acting Environmental Program Manager

cc: Ms. Drake  
Mr. Williamson